

**ORANGE COUNTY EMERGENCY COMMUNICATIONS CENTER  
ORANGE, VIRGINIA**



Domonique Curry, CPE  
*Emergency Communications Center Director*  
(540) 661-5433 direct  
(540) 672-6375 fax  
Email: [dcurry@orangecountyva.gov](mailto:dcurry@orangecountyva.gov)

E911 – Fire – Rescue – L.E.  
Communications  
112 West Main Street  
P O Box 111  
Orange, VA 22960

Via Electronic Comment Filing System  
November 13, 2019  
Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Notice of Ex Parte, PS Docket No. 07-114

Dear Ms. Dortch:

I am the Director of the Orange County Emergency Communications Center. I write to voice my support for APCO's position that the FCC's draft z-axis order must be changed to ensure that 9-1-1 professionals receive actionable location information when our citizens place an emergency call from inside buildings. This would best assist us with carrying out our mission to protect and save lives.

My agency processes 50,525 9-1-1 calls per year, with approximately 89% originating from cell phones.

The location information must be actionable, meaning that Public Safety Telecommunicators (PSTs) can quickly use it to assist the caller and direct responders to the scene. A "dispatchable location," as defined by the FCC, remains the gold standard from an operational perspective. However, if wireless carriers are unable to provide a dispatchable location, and instead provide z-axis information, they should be required to make that information as actionable as possible by including an estimated a floor number.

A raw vertical estimate is of little operational value if it is relative to "height above ellipsoid" (HAE). 9-1-1 centers like mine do not have the resources to create and maintain indoor maps for buildings in our jurisdictions, nor should we be expected to do so. Even if we did, we would not have the ability to translate HAE to a floor, or visualize a three dimensional point in space. The expectation for a dispatcher to locate floor maps then calculate an estimated location is both unrealistic and could cause life-threatening delays. In the field of Public Safety, saving seconds saves lives.

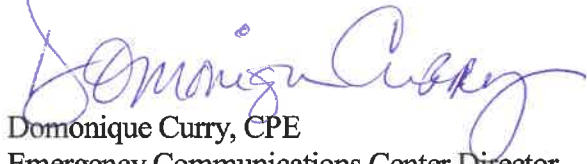
I would also caution against an assumption that our law enforcement, fire, and EMS counterparts in the field will have devices capable of measuring altitude as HAE, and will easily be able to match their

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measurements to what's received for the 9-1-1 caller. This will be especially difficult and even unsafe during emergencies such as a building fire or active shooter incident when first responders cannot be looking down at a device.

For 9-1-1 professionals to have the information they need to ensure that responders arrive as quickly as possible, carriers should at least provide a floor number estimate (e.g. "4th floor," rather than only providing "76 meters HAE, +/- 3 meters"). Accordingly, as you contemplate rules for a z-axis metric, I urge you to consider requiring wireless carriers to provide a floor number as part of the z-axis information. Requiring wireless carriers to provide actionable location information about 9-1-1 callers, using any and all available technologies, will save lives.

Thank you for taking my views into consideration.



Domonique Curry, CPE  
Emergency Communications Center Director  
Orange County Emergency Communications